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7 Attorneys for Plaintiff, Maureen Gaughan, Chapter 7 Trustee

8 **IN THE UNITED STATES BANKRUPTCY COURT**
9 **FOR THE DISTRICT OF ARIZONA**

10 *In re:*

11 **CHARLES THOMAS BROWN d/b/a TOM**
12 **BROWN PREFERRED TRUST COMPANY,**

13 Debtor

14 **MAUREEN GAUGHAN, Chapter 7 Trustee,**

15 Plaintiff

16 v.

17 **ANN AKAMINE; et al.**

18 Defendants

Proceedings Under Chapter 7

No. 97-14228-PHX-GBN

Adversary Proceeding No.: 99-00746

**PLAINTIFF'S FOURTH APPLICATION
FOR ENTRY OF DEFAULT**

19
20 Plaintiff, Chapter 7 Trustee Maureen Gaughan ("Plaintiff"), through Counsel, Ryley, Carlock &
21 Applewhite, P.A., requests, pursuant to the provisions of Rule 7055(a), Federal Rules of Bankruptcy
22 Procedure, that the Clerk of this Court enter the default of the following Defendants: Brad Jones, Kim Jones,
23 Joan Heinemann, Sakkar Ramaswamy, Vellayan Ramaswamy, and Umayal Ramaswamy (collectively the
24 "Non-Answering Defendants").

25 Default is requested against the Non-Answering Defendants for the reason that the Non-Answering
26 Defendants have failed to plead or otherwise defend this action as provided by the Federal Rules of

1 Bankruptcy Procedure. Plaintiff has filed with the Clerk of this Court an Affidavit of Default in support of
2 this application.

3 DATED this 19th day of January, 2001.

4 RYLEY, CARLOCK & APPLEWHITE, P.A.

6 By: *T. Brent Galligan*
7 John J. Fries
8 T. Brent Galligan
9 101 N. First Avenue, Suite 2700
10 Phoenix, Arizona 85003-1973
11 Attorney for Plaintiff, Maureen Gaughan,
12 Chapter 7 Trustee

11 A copy of the foregoing
12 was mailed this 19th day
13 of January, 2001 to:

13 Brad Jones and Kim Jones
14 594 LaSalle Street
15 Des Plaines, IL 60016-2944

15 Joan Heinemann
16 c/o John S. Biallas, Esq.
17 3 N. 918 Sunrise Lane
18 St. Charles, IL 60174

18 Sakkar Ramaswamy
19 c/o David Engelman, Esq.
20 3636 N. Central Avenue, Suite 1100
21 Phoenix, AZ 85012

20 Vellayan Ramaswamy and Umayal Ramaswamy
21 9908 N.W. 59th Place
22 Gainesville, FL 32653-2833

22 By *Deborah Robertson*
23